

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HOLLY YENCHA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

ZeoBIT LLC, a California limited liability company,

Defendant.

Case No. 2-14-cv-00578-JFC

Honorable Joy Flowers Conti

**PLAINTIFF'S MOTION FOR APPROVAL OF
ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARD**

Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiff Holly Yencha ("Plaintiff"), respectfully requests that the Court enter an Order approving her request for an award of reasonable attorneys' fees and expenses to Class Counsel, and an incentive award for her role as Class Representative in connection with the Parties' proposed class action settlement of this matter. Plaintiff's motion is based up on her Memorandum of Law (and the exhibits attached thereto) in support of the motion and the record in this matter, along with any oral argument that may be presented to the Court and evidence submitted in connection therewith.

WHEREFORE, Plaintiff Holly Yencha, individually and on behalf of the Settlement Class, respectfully requests that the Court enter an Order (1) approving an award of \$660,000.00 in attorneys' fees and expenses to Class Counsel, (2) approving an incentive award of \$1,000.00 in recognition of her efforts on behalf of the Settlement Class, and (3) providing such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

HOLLY YENCHA, individually, and on behalf of
a class of similarly situated individuals,

Dated: September 7, 2015

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I, Benjamin H. Richman, an attorney, hereby certify that on September 7, 2015, I served the above and foregoing ***Plaintiff's Motion for Approval of Attorneys' Fees, Expenses, and Incentive Award*** by causing a true and accurate copy of such paper to be filed with the Court and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Benjamin H. Richman